## Exhibit A

## **Jake Bernstein**

From: Derek Linke

**Sent:** Tuesday, April 28, 2015 10:44 AM

To: Nicholas M. DePalma
Cc: Derek A. Newman

**Subject:** Verisign, Inc. v. XYZ.com LLC - Discovery Extension

I'm writing to request a two-week extension to produce documents in response to Verisign's requests for production to XYZ and Negari. The responses are currently due this Thursday.

Verisign's document requests are quite broad and it was difficult for our client to search for documents in-house. So they engaged a vendor to assist, who still hasn't delivered the results. Also, our clients would not deliver most of the documents without a protective order.

Considering that we haven't resolved the protective-order issues, a two-week extension should not change the date when Verisign would receive the bulk of the documents anyway.

We plan to respond to the interrogatories by Thursday.

We'd be very grateful for the courtesy of an extension. Thank you for your consideration.

## Derek Linke

Nick,

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